

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

MARK MARKHAM, GREGG DOUD, and
JEROME GILBERT, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

NATIONAL GEOGRAPHIC PARTNERS LLC,

Defendant.

Civil Action No.: 19-cv-00232

Hon. Janet T. Neff

Philip L. Fraietta, Esq.
Joseph I. Marchese, Esq.
BURSOR & FISHER, P.A.
Counsel for Plaintiffs
888 Seventh Avenue
New York, NY 10019
Tel: 646-837-7150
Fax: 212-989-9163
pfraietta@bursor.com
jmarchese@bursor.com

Frank S. Hedin, Esq.
HEDIN HALL LLP
Counsel for Plaintiffs
1395 Brickell Avenue,
Suite 900
Miami, Florida 33131
Tel: 305-357-2107
Fax: 305-200-8801
fhedin@hedinhall.com

Theodore W. Seitz (P60320)
Elisa J. Lintemuth (P74498)
DYKEMA GOSSETT PLLC
Attorneys for National Geographic
Partners LLC
Dykema Gossett PLLC
300 Ottawa Ave. N.W., Suite 700
Grand Rapids, MI 49503
(616) 776-7500
tseitz@dykema.com
elintemuth@dykema.com

**JOINT NOTICE OF SETTLEMENT AND REQUEST FOR
ADJOURNMENT OF TIME TO FILE REPLY**

The parties in the above-captioned matter hereby advise the Court that they have reached a settlement and are in the process of finalizing documentation. The parties anticipate filing a dismissal with the court on or before January 27, 2020.

Further, the parties agree to an extension of time, up to and including, January 27, 2020, for Defendant to file a Reply to Plaintiffs' Response (ECF No. 26) to Defendant's Pre-Motion Request (ECF No. 23).

/s/ Philip L. Fraietta (w/permission)

Philip L. Fraietta
Joe Marchese
BURSOR & FISHER, P.A.
Attorney for Plaintiff
888 Seventh Avenue
New York, NY 10019
(646) 837-7150
pfraietta@bursor.com
jmarchese@bursor.com

and

Frank S. Hedin
HEDIN HALL LLP
Attorney for Plaintiff
1395 Brickell Ave., Ste 900
Miami, FL 33131
(305) 357-2107
fhedin@hedinhall.com

/s/ Theodore W. Seitz

Jill M. Wheaton (P49921)
Rosa M. Tumialán (IL – 6226267)
Theodore W. Seitz (P60320)
Elisa J. Lintemuth (P74498)
DYKEMA GOSSETT PLLC
Attorneys for National Geographic
Partners LLC
300 Ottawa Ave. N.W., Suite 700
Grand Rapids, MI 49503
(616) 776-7500
jwheaton@dykema.com
rtumialan@dykema.com
tseitz@dykema.com
elintemuth@dykema.com